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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

SUMMARY NOTES FROM AN INFORMAL MEETING WITH THE AMERICAN WOOD
PRESERVERS INSTITUTE

(Re. Consumer Information Program)
May 30, 1991

Representatives from the American Wood Preservers Institute (AWPI) met informally with select members of the wood preservative team to discuss the voluntary Consumer Awareness Program (CAP) and to express their position regarding the annual compliance survey. The meeting was held at 10:30 in Conference Room 2, Crystal Station #1, 2800 Jefferson Davis Highway, Arlington, Virginia.

AWPI and EPA agreed that while the compliance levels among suppliers and treaters was at or near 100% for five consecutive years, the Voluntary CAP was not as successful in informing the consumer of the proper precautions that should be taken when handling, using and disposing of treated wood. AWPI pointed out that lower levels of participation among wholesalers and retailers, which contributed to lower consumer awareness, was because the wholesalers and retailers of treated lumber are outside of AWPI's sphere of influence.

AWPI indicated that the results of the past 5 annual audits had been consistent and that participation and awareness among treaters, wholesalers, distributors and retailers were not expected to change significantly in 1991. AWPI also indicated that the annual audits were very expensive and placed a strain on its budget. In addition, the Society of American Wood Preservers had gone out of business and AWPI was left alone to bear the burden of administering and monitoring the CAP. AWPI expressed a strong desire not to conduct an audit this year and instead use its resources to get more information about treated wood into the hands of the consumer.

AWPI requested that the 1991 audit of the CAP be held in abeyance until it could meet with members of the wood preserving industry to ascertain if they would support a new approach to the CAP.

EPA representatives agreed that the survey results suggested that a new approach to gathering and disseminating consumer information about treated wood is appropriate. However, EPA

informed AWPI that it is very likely that the Agency will require some type of compliance survey this year. EPA advised AWPI to proceed with its plans for getting out more information about the CAP but not to drop its commitment to conduct an audit (compliance survey) for 1991. EPA emphasized that the audit (compliance survey) is the only means available to the Agency to evaluate the effectiveness of the CAP. Also, effectiveness of the CAP is a determining factor in deciding whether further regulation of treated wood is necessary. EPA representatives suggested that the 1991 survey might be designed to elicit information on why the voluntary CAP is not achieving its intended goal.

AWPI indicated that it planned to develop a research program designed to answer many of the questions consumers ask about the safety of using treated wood in various home and garden situations.

AWPI proposed the following:

1. Defer the audit until it has met with wood treaters/suppliers.
2. Allow AWPI 60 to 90 days to meet with the wood treaters/suppliers to work out a proposal for the 1991 CAP.
3. Present a proposal to EPA within 60-90 days designed to satisfy the requirements of the settlement agreement and improve the flow of consumer information about treated wood to the consumer.

EPA representatives agreed to consider AWPI's proposal by presenting it to the full wood preservative team provided that AWPI submit an outline shortly explaining the key elements of the proposal and how it will be implemented. EPA indicated that it would plan to get back to AWPI with its recommendations regarding the proposal within 15 days after receipt of the outline.

The following persons attended the meeting:

Victor Lindenheim, AWPI
Melissa Nixon, AWPI
Larry Ebner, AWPI
Barbara Pace, EPA, Office of General Counsel (OGC)
Steve Howie, EPA, Office of Compliance Monitoring (OCM)

The meeting was adjourned at 11:35 am.

Respectfully submitted

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